CERTIFICATE OF SERVICE

I, Carol Park, an employee of Haley, Bader & Potts, hereby certify that on this 15th day of June, 1993, sent copies of the foregoing "COMMENTS OF RADIAN CORPORATION," via first-class postage pre-paid U.S. Mail to the following:

Joseph **A Godles**GOLDBERG, GODLES; WIENER & WRIGHT
1229 Nineteenth Street, N.W.
Washington, D.C. 20036
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Washington, D.C. 20036
Counsel for Telxon Corporation

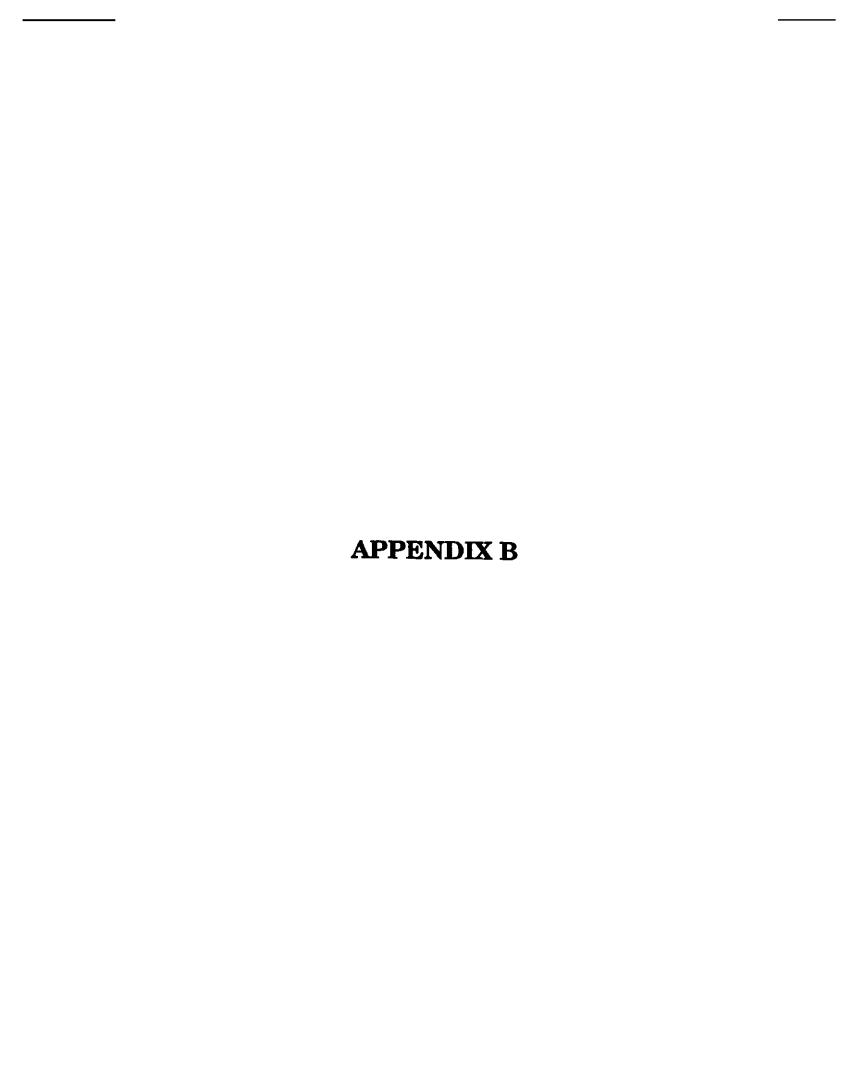
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Counsel for **AMTECH** Corporation

Christopher D. **Imlay**BOOTH, FRERET & **IMLAY**1233 20th Street, N.W., **Suite** 204
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Courisel for HUGHES AIRCRAFT COMPANY

Carol A. Park

Carol A. Park





United States Department of Commence National Coagnic and Atmospheric Administration OFFICE OF DCEANIC AND ATMOSPHIERIC HESEARCH Environmental Hessarch Laboratorisa 1335 East West Highway Silver Spring, Maryland 20010

JUN 1 | 1993

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office of the secretary Federal Communications Commission

Washington, D.C. 20554

FCC MAIL ROOM

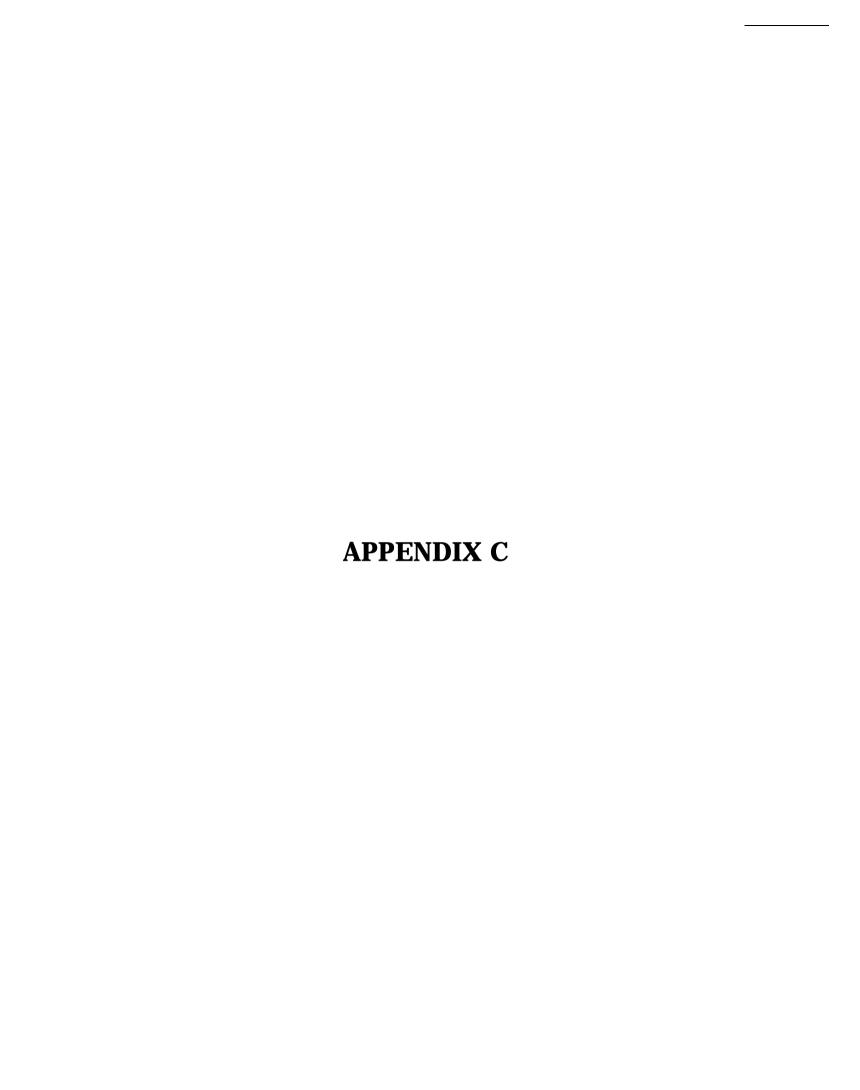
Gentlemen:

This letter is in comment to the Notice of Inquiry FCC (RM-8092) to accommodate non-Government wind profiler radars in a band centered on 915 MHz.

During the 1980's, staff of the Environmental Research Laboratories (ERL) of this National Oceanic and Atmospheric Administration (NOAA) conceived, developed, fabricate& and deployed small, mobile, and inexpensive 915 MHz radars capable of measuring the profile of winds from about 100 to 3000 meters above the surface of the Earth. Their value in meteorological and climatological research and acid rain and air pollution studies was amply demonstrated -in field experiments carried out throughout the United States and internationally. In light of this success, ERL entered into a Cooperative Research and Development Agreement with the Radian Corporation in 1991 for the purpose of transferring the 915 MHz wind profiler technology developed in Government laboratories to the private sector. That profiler technology has been successfully transferred and Radian wishes to develop a market for these devices.

In the current Tables of Frequency Allocations, non-military Government profilers are secondary to military radiolocation devices, but primary to all other users in the 902-928 MHz band. While this circumstance

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UNITED STATES ENVIRONMENTAL PROTECTION AGE Office of Air Quality Planning and Standards Research Triangle Park, North Carolina 27711

1 5 JUN 1993

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Office of the Secretary
Federal Communications Commission
Attention: ET Docket Case 93-59
Office of Engineering and Technology
1919 M Street, N.W.
Washington, D.C. 20554

FCC - MAIL ROOM

Dear Sir:

This is in response to the Notice of Proposed Rulemaking, and Notice of Inquiry (FCC 93-136) regarding the FCC proposal to allocate the 449 MHz band for wind profiler radar systems (wind profilers) and the request for public comment on whether, in addition to 449 MHz, the 915 MHz band should also be allocated for wind profilers.

As a National Oceanic Atmospheric Administration (NOM) meteorologist assigned to the Office of Air Quality Planning and Standards (OAQPS) of the U.S. Environmental Protection Agency (US EPA), I support the use of the 915 MHz band for wind profilers and urge the FCC to proceed with allocation. The 915 MHz wind profiler is essential for activities requiring high resolution (loo-meters) wind profiling in the lower atmospheric boundary layer - profilers that operate in the 400 MHz range, while useful for weather forecasting purposes, are considerably more expensive, and do not provide sufficient resolution for important air guality applications including, for example, evaluations involving ozone formation and transport. To provide the best overall coverage for the atmospheric boundary layer, both frequencies (449 MHz and 915 MHz) should be allocated for wind profilers.

These views are shared by many of the NOM meteorologists assigned to EPA and with whom I work. In response to my informal survey at a recent air quality modeler's workshop, 19 of the 22 participants who responded indicated a strong need for the 915

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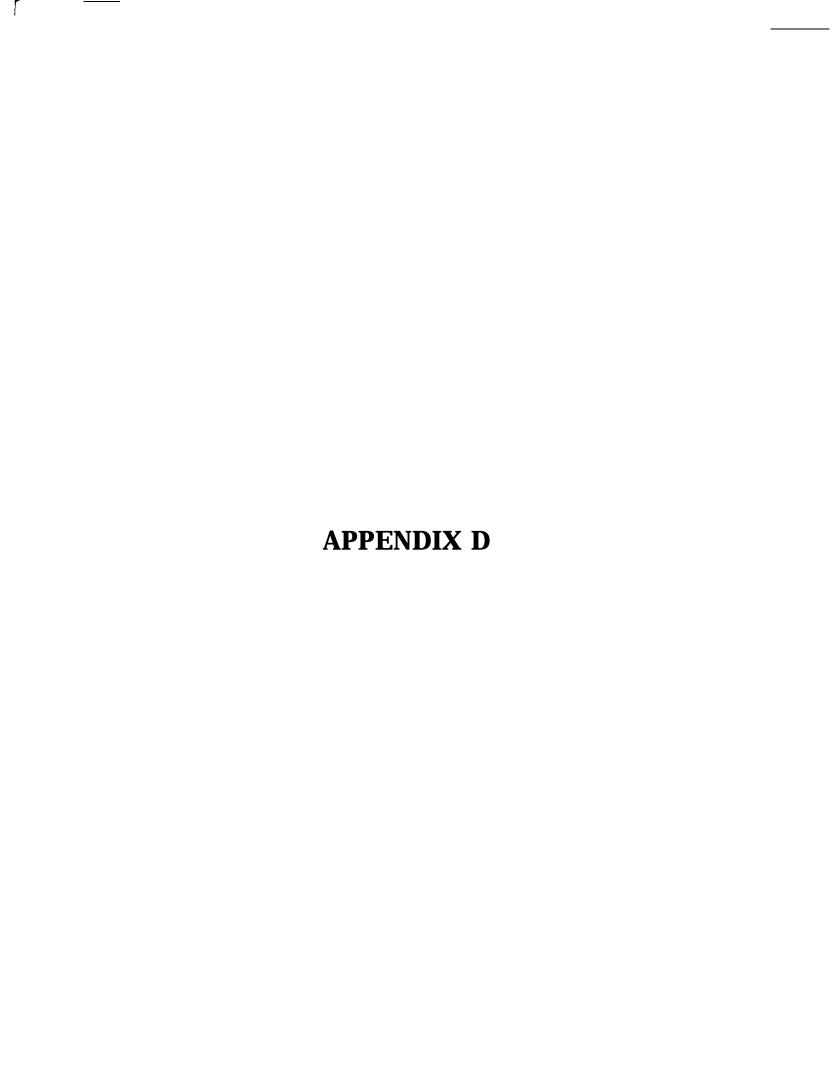
 ${\tt MHz}$ band. On their behalf, I urge you to allocate the 915 ${\tt MHz}$ band for wind profilers.

Sincerely,

Desmond T. Bailey
Meteorologist
Source Receptor Analysis Branch

cc: **J. Irwin**

R. Scheffe J. Tikvart



House of Representatives Washington, D. C. 20818

J. J. PICKLE IOTH DISTRICT, TERAS

June 10: 1993

Ms. Donna Searcy

Secretary

Federal Communications Commission

٠٠,

1919 M Street, NW

Washingtion, D.C. 20554

Dear MB. Seercy:

I am writing you concerning an upcoming Federal Communicationa Commission decision regarding the allocation of 915 MHz as an allowable frequency for radar wind profilers.

This upcoming FCC ruling on Wind profilers was brought to my attention by a research and development firm doing business in my district. The company, Radian Corporation, specializes in the development of environmental technology and has forged an agreement with Sonoma Technology, inc., and the National Oceanic and Atmospheric Administration to develop and commercialize the

commercialize this technology; and make it available for users interested in long-term atmospheric monitoring.

As you may know, radar wind profilers have the capability of measuring wind and temperature in the lower atmosphere with high resolution: It is my understanding that this technology has proven useful in air quality research studies, many of them in Texas, and is currently being used by the EPA in areas with high orone concentrations:

Please give every consideration to setting aside this frequency. Thank you for your time:

With best regards, I am

Sincerely,

J. J. PICKLE

JJP:mmh cc: Donald Carlton

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